

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CASE NUMBER 1:20CV66**

CARYN DEVINS STRICKLAND,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
UNITED STATES OF AMERICA, et al.,	)	
	)	
<u>Defendants.</u>	)	

**MOTION FOR EXTENSION OF TIME TO FILE  
OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION**

Defendants respectfully move for a 12-day extension of time to file Defendants' opposition to Plaintiff's Motion for Preliminary Injunction in this case. Defendants' opposition is currently due on August 10, 2022, and Defendants seek an extension until August 22, 2022.

Good cause supports this motion. Plaintiff's Motion for Preliminary Injunction raises many of the same arguments that were raised in Plaintiff's supplemental summary judgment memorandum, to which Defendants are currently drafting a response. *Compare* Mot. for Prelim. Inj., ECF No. 125, at 6-11, *with* Pls' Suppl. Mem. in Supp. of Her Mot. for Partial. Summ. J. Against the Official Capacity Defs, ECF No. 116-1, at 5-9. Given the substantial overlap between the two motions, it makes sense for Defendants' responses to those motions to be due on the same date. Defendants' response to Plaintiff's supplemental summary judgment memorandum is due on August 22, 2022, and Defendants respectfully seek the same deadline for their opposition to Plaintiff's Motion for Preliminary Injunction.

In addition, this extension of time is necessary because of various other upcoming litigation deadlines facing Defendants' counsel in this and other federal court matters. Over the past weeks,

Defendants' counsel have been very busy drafting Defendants' answer to Plaintiff's 505-paragraph complaint, and that answer is due today. The parties must meet and confer and file a joint proposed case management statement by August 15, 2022. And, as noted, Defendants' counsel are working on a response to Plaintiff's supplemental summary judgment memorandum. The undersigned counsel has various upcoming deadlines in other matters too. In particular, the undersigned counsel is currently drafting a memorandum regarding remedies in an administrative law case following remand by the Supreme Court. Given these various upcoming deadlines, additional time is necessary for counsel to draft an opposition to Plaintiff's Motion for Preliminary Injunction, and have it reviewed by the clients and within the Department of Justice.

Pursuant to Local Civil Rule 7.1(b)(2), the undersigned conferred with Plaintiff's counsel regarding this Motion. Plaintiff's counsel stated that based on the undersigned counsel's representation that the Court ordered a deadline of August 22 for Defendants' summary judgment supplemental memorandum, Plaintiff does not oppose allowing Defendants to file their summary judgment supplemental memorandum and their preliminary injunction response together on August 22.

Respectfully submitted,

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